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State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
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15 APR 1991

Pamela Baxter, Project Manager
Northern New Jersey Section II
Emergency and Remedial Response Division
USEPA Region II
26 Federal Plaza
New York, NY 10278

Dear Ms. Baxter:

Re: Millington Asbestos Satellites
Draft Feasibility Study, New Vernon Road
and White Bridge Road Asbestos Dump Sites, Meyersville, N.J.,
Preparation Date March 12, 1991

The New Jersey Department of Environmental Protection (Department) has reviewed the above referenced draft Feasibility Study and finds the document acceptable providing the following comments are addressed.

1. 40 CFR Ch. 1, Part 61, Subpart M - National Emission Standards for Asbestos should be included as a Federal Action-Specific ARAR/TBC in Table 2-5. These regulations detail cover/capping standards for inactive waste disposal sites for asbestos mills and manufacturing and fabricating operations. Alternative #2 would be required to attain these standards.

2. The Department agrees that four new monitoring wells need to be installed at both sites no matter which remediation is selected. These wells must be sited close to the areas in which ACM is identified.

3. The Department recommends that the "In-situ stabilization/solidification" alternative should be groundwater monitored for 30 years (with reassessment every five years and possible adjustment of frequency, parameters, etc.) for the following reasons:

   a. Despite fixation of ACM into a cement or pozzolan matrix, the chemical characteristics (toxicity) of the asbestos will remain unchanged by the process. The solidified material actually will remain landfilled on the site following solidification. The potential for leaching of these asbestos from the encapsulated material exists, particularly since it

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appears that some of the solidified ACM will remain in the water table.

b. As indicated by Alliance in the FS, in the case of any in-situ treatment, there is a potential that some of the ACM may not be encapsulated at all. Since the ACM is not actually removed from the disposal area for treatment, visual observations and/or confirmatory sampling cannot be used to ensure adequate treatment of all ACM.

c. Regardless of the length of the monitoring program devised for these sites under this alternative, the stability of encapsulated ACM under saturated conditions should be evaluated. The Department generally does not approve of final disposal options where wastes will remain in contact with ground water. Passive methods of diverting ground water flow from beneath the asbestos disposal areas should be considered to minimize the potential for leaching of asbestos.

The Department feels that the two alternatives, native soil/vegetation capping and in-situ stabilization/solidification, are the preferred remediations considering, the given description of the alternatives and the current status of these sites.

Should you have any questions on these comments you may contact me at (609) 633-1455.

Very truly yours,

E. G. Kaup

Edgar G. Kaup, P.E., Case Manager
Bureau of Federal Case Management

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c: S. Byrnes, BEERA
E. Fernandez-Obregron, BGWPA